

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2017-381-A

IN RE:

Office of Regulatory Staff's Petition for an Order Requiring Utilities to Report the Impact of the Tax Cuts and Jobs Act)))))	PETITION TO INTERVENE
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Petitioners Landtech, LLC ("Landtech") and Lake Carolina Development, Inc. ("Lake Carolina Development") (together "Petitioners"), hereby petition the South Carolina Public Service Commission (the "Commission"), pursuant to Rule 103-825 of the Commission's Rules, for an order allowing Petitioners to intervene in the above referenced Docket, with full rights to participate as a party of record. In support of its petition, Petitioners would show the Commission the following:

1. Landtech is a real estate development and management firm located at 522 Lady Street, Suite 200, Columbia, SC 29201. LandTech, through its affiliates Coatbridge Development, LLC, Lakes at Barony, LLC and Alden Pond, LLC, has multiple residential communities under development in the Midlands of South Carolina and specifically within the service area of Palmetto Utilities, Inc. ("PUT") and/or Palmetto Wastewater Reclamation, LLC ("PWR"). Active projects include the Coatbridge, Sterling Ponds, Long Cove, Lakes at Barony

Place, Alden Glen and Autumn Pond. In total, these communities represent approximately 600 residential units, with approximately 150 currently developed and 450 remaining to be developed. Landtech has made and will make in the future contributions in aid of construction ("CIAC") to PIU and PWC.

2. Lake Carolina Development is a real estate development firm located at 1276 Assembly Street, Columbia, SC 29201. Lake Carolina Development is the developer of the Lake Carolina master planned development located in Richland County, SC, which is located within the service area of PUI. Lake Carolina consists of a mixture of commercial districts and residential neighborhoods, with approximately 3,500 existing residential dwelling units, 300 apartment units and 100,000 square feet of commercial development and approximately 7 acres of commercial land and 420 residential units remaining to be developed. Lake Carolina Development has made and will make in the future contributions in aid of construction ("CIAC") to PIU and PWC.

3. Petitioners have an interest in this proceeding by virtue of being affected by the Tax Cuts and Jobs Act as applied by Commission Order No. 2018-252. In particular, Commission Order 2018-252 would apply a "tax multiplier" to those contributions in aid of construction made by Petitioners to ("PUI") and ("PWR").

4. As described more fully in the Petition for Rehearing or Reconsideration filed concurrently herewith, the Petitioners do not believe a "tax multiplier" for PUI or PWR is warranted. More fundamentally however, the Commission must consider the impact of the Tax Cuts and Jobs Act on PUI and PWR as a whole, and not merely based on one particular effect of one specific provision thereof.

5. Petitioners should therefore be permitted to intervene in this proceeding in order to seek review of Commission Order No. 2018-252, and to participate fully and present testimony and other evidence in this Docket as appropriate.

6. Currently the Petitioners' interest in this Docket relates specifically to the relief initially granted to PUI and PWR. However, Petitioners reserve the right to set forth their position more fully as necessary and appropriate as this proceeding moves forward.

7. Petitioner's authorized representative in this proceeding is the undersigned.

WHEREFORE, Petitioners pray for the Commission to:

- a. Grant this Petition to Intervene and make Petitioners a party of record in Docket No. 2017-381-A, allowing Petitioners to participate fully and take such positions as it deems advisable; and
- b. Grant such other relief as the Commission deems just and proper.

Respectfully submitted,

ADAMS AND REESE LLP

BY: 

John J. Pringle, Jr., Esquire
1501 Main Street, 5th Floor
Columbia, SC 29201
(803) 343-1270
jack.pringle@arlaw.com
Attorneys for Petitioners

April 24, 2018
Columbia, South Carolina

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CERTIFICATE OF SERVICE

This is to certify that I have caused to be served this day, the **Petition to Intervene** to the individuals listed below via electronic mail to the e-mail address on file with the Public Service Commission

Becky Dennis
bdennis@swwc.com
Benjamin P. Mustian
bmustian@willoughbyhoefer.com
Bettye J. Willis
bettye.j.willis@windstream.com
Billy F. Burnett
billyfburnett@sc.rr.com
Bruce P. Barkley
Bruce.Barkley@piedmontng.com
Bryan Stone
bstone@lockhartpower.com
Carolyn H. Smith
haynesconst@homes.com
Carroll Norman
gailnorman8@outlook.com
Charles L.A. Terreni
charles.terreni@terrenilaw.com
Charlie Northcutt
charlie@hmnorthcutt.com
Chris Barry
chrisbarry29@gmail.com

Dale S. Ness Jr.
 nessproperties@gmail.com
David Shoemaker
 dshoe712@mac.com
Debra McGriff
 debbie.mcgriff@hometelco.com
Deloris Carroll
 deloris.carroll@centurylink.com
Don Smith
 donnsmith42@yahoo.com
Duane Carroll Dowd
 duane.dowd@gmail.com
Frank R. Ellerbe, III
 fellerbe@sowellgray.com
G. Trenholm Walker
 walker@WGFLLA.W.com
Greg Lunsford
 greg.lunsford@comporium.com
Heather Shirley Smith
 Heather.smith@duke-energy.com
J. Brian Singleton
 bsingleton@truvista.biz
J. David Black
 DBlack@nexsenpruet.com
James C. Meade
 Email: jim.meade@tdstelecom.com
James H. Jeffries, IV
 jjeffries@mcquirewoods.com
James H. Seay, Jr.
 jseay@lockhartpower.com
James P. Wilder
 jimw@prtcom.com
Janet Teichman
 teich1648@gmail.com
Jason Dandridge
 jason.dandridge@prt.coop
Jayne T. Eve
 jayne.t.eve@windstream.com
Jeff Lawrimore
 lawrimoj@ftc.org
Jeff T. Wilson
 jeff.wilson@wctel.com
Jeffrey M. Nelson
 jnelson@regstaff.sc.gov

Jenny R. Pittman
jpittman@regstaff.sc.gov

John F. Guastella
jfg@guastella.com

John M.S. Hofer
jhofer@willoughbyhofer.com

John Walton
blueridgeurology33@yahoo.com

Joseph E. Swearingen Sr.
jillc@aaawelldrilling.com

K. Chad Burgess
chad.burgess@scana.com

Kim Shepherd
kim.shepherd@skyline.org

L. B. Spearman
ben.spearman@comporium.com

Larry Schmid
schmid09@gmail.com

Lynda B. Miller
lbmiller@thejacksoncompanies.com

M. John Bowen Jr.
jbowen@mcnair.net

Margaret M. Fox
pfox@mcnair.net

Marilyn Edwards
edwardsmerepoule@gmail.com

Mark Daday
Email: mdaday@niamerica.com

Mark S. Wrigley
Wrigm32@yahoo.com

Matthew W. Gissendanner
matthew.gissendanner@scana.com

Melissa D. Gause
corporate@lakewoodcampground.com, bwiley@lakewoodcampground.com

Michael Cartin
mrcartin@uiwater.com

Mike Hagg
curley.huggins@htc.nc.net

Pam Threatt
weeznduff@charter.net

Patrick Turner
pt1285@att.com

Paul Epting
paul.epting@ngu.edu

Paul Steinburg
psteinburg@yahoo.com
Rebecca J. Dulin
rebecca.dulin@duke-energy.com
Robert G. Gross
bob@beaufortgroup.net
Robert LaBonte
rjl@hargray.com
Sam D. Weaver
recycleh2o@condorenvironmental.org
Sara S. Rogers
srogers@nexsenpruet.com
Stephen R. Goldie
steve@goldieassociates.com
Susan A. Miller
susan.miller@ftr.com
Susan B. Mikell
smikell@aol.com
Thomas P. Gressette Jr.
Gressette@WGFLAW.com
Timothy P. Oliver
sarah.o.bedard@gmail.com
Tommy Dabney
tom.dabney@comporium.com
Tony Williamson
twilliamson@landenv.com
Valerie Ancrum
valerie.ancrum@prtc.coop
Wayne Owens
wowens@tesi-usa.com
Will L. Helmly
will.helmly@hometelco.com
Wright L. Phillips
kimphillips12169@gmail.com
Trey Judy
trey.judy@htc.hargray.com

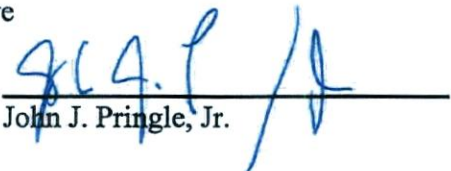
Additionally, I have served the below individuals by placing the same in the care and custody of the United States Postal Service with first class postage affixed thereto and addressed as follows:

John M.S. Hoefer, Esquire
Benjamin Mustian, Esquire
Willoughby & Hoefer, P.A.
P.O. Box 8416

Columbia, SC 29202-8062

Jeffrey M. Nelson, Esquire
Jenny Pittman, Esquire
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201

Edward B. Ford
133 Heather Lock Drive
Clover, SC 29170


John J. Pringle, Jr.

April 24, 2018
Columbia, South Carolina